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October 18, 2021

**VIA ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

RE: *National Day Laborer Organizing Network et. Al. v. ICE et al.*, No. 16 Civ. 387 (PAE)

Dear Judge Engelmayer:

We represent Plaintiffs National Day Laborer Organizing Network in connection with the above-referenced action. As the parties have previously informed the court, the only remaining issue in this case is attorneys' fees. On August 16, 2021, the Court ordered the parties to provide an update with respect to this issue by October 18, 2021. *See* Dkt. No. 210. We write on behalf of all parties requesting an additional 60 days for the parties to continue their negotiations with respect to attorneys' fees.

As noted in the parties' August 16, 2021 letter, the parties have exchanged information and continue to confer regarding the attorneys' fees in this case in the hope of resolving the outstanding issue of attorneys' fees in this case without motion practice. *See* Dkt. No. 209. On August 4, 2021, the parties had a video meeting to discuss Plaintiffs' demand and Defendants' response. Plaintiffs are currently evaluating and preparing a response to the legal and factual questions Defendants raised in the August 4, 2021 meeting.

The parties respectfully request additional time to continue negotiations, and to jointly update the Court as to the status of any remaining issues in this case on or before December 17, 2021.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Therese Craparo

Therese Craparo (TC-4003)

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Counsel for Plaintiff

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Attorneys for Plaintiffs

cc: All counsel of record (via ECF)

Granted. SO ORDERED.

October 19, 2021



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PAUL A. ENGELMAYER  
United States District Judge